



TIMOTHY J. PETER
tpeter@faruqilaw.com

November 2, 2018

Via ECF

Honorable P. Kevin Castel
United States District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
Courtroom 11D
New York, NY 10007

Re: *Alexandria Rudolph v. Hudson's Bay Co., et al.*, No. 1:18 cv 8472(PKC)

Dear Judge Castel:

I represent Plaintiff Alexandria Rudolph and the putative class in the above-titled matter. I write in response to your Honor's Endorsed Memo Order entered on October 25, 2018, directing Plaintiff to state whether she wishes to further amend her complaint to address the issues raised by Defendants in their pre-motion letter dated October 18, 2018.

Plaintiff respectfully submits that she wishes to amend her complaint. The Parties have met and conferred, and Defendants have no objection to Plaintiff filing an amended complaint. In terms of Defendants' response, the Parties are still prepared to proceed with the dates previously stipulated to and set by the Court in its September 28, 2018 Order in regard to the motion to dismiss, that I understand Defendants still intend to pursue:

Initial Pre-Trial Conference: November 19, 2018

Motion and Opening Brief Due: December 5, 2018

Opposition to Motion Due: January 3, 2019

Reply in Support of Motion Due: January 22, 2019

Accordingly, Plaintiff respectfully requests the Court set a date by which Plaintiff shall file an amended complaint, before the November 19 Initial Pre-Trial Conference. The Parties look forward to discussing any other matters raised by the pre-motion letters at the November 19 conference.



FARUQI & FARUQI
LLP
ATTORNEYS AT LAW

Honorable P. Kevin Castel
November 2, 2018
Page 2

Respectfully submitted,

/s/ Timothy J. Peter

Timothy J. Peter

cc: All counsel of record (via ECF)